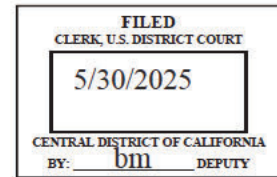




UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

Sergio Ivan Contreras,

Defendant

Case No. 2:25-MJ-03329-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of May 15, 2025 in the county of Ventura in the Central District of California, the defendant violated:

Code Section

18 U.S.C. § 922(g)(1)

Offense Description

Felon in Possession of Firearm and Ammunition

This criminal complaint is based on these facts:

Please see attached affidavit.☒ Continued on the attached sheet.

/s/

Complainant's signature

Jannah R. Holden, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 5/30/2025

Judge's signature

City and state: Los Angeles, California

Hon. Jean P. Rosenbluth, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Jannah R. Holden, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint again, and arrest warrant for, Sergio Ivan CONTRERAS ("CONTRERAS") for a violation of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm).

2. The facts set forth in this affidavit are based upon my personal observations; my training and experience; and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only.

II. BACKGROUND OF SPECIAL AGENT BLAKE MACLEARNSBERRY

3. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), and have been so employed since September 2020. I am a graduate of the Federal Law Enforcement Training Center ("FLETC") in Glynco, Georgia, and have completed the ATF National Academy's Special Agent Basic Training course. I am currently assigned to the ATF Los Angeles Division, Glendale V Field Office, in Glendale, California.

4. I received a Bachelor of Science degree in Criminal Justice from Old Dominion University in Norfolk, Virginia, and a Master of Science Degree in Criminology from Boston University in Boston, Massachusetts. I served in the United States Navy and honorably separated in 2004 at the rank of Petty Officer Second Class. I thereafter worked for seven years with the Federal Bureau of Investigation in Norfolk, Virginia and Los Angeles, California. Prior to becoming a Special Agent with ATF, I served as a Special Agent with the Naval Criminal Investigative Service for approximately three years.

5. During my tenure as a Special Agent at ATF, I have received training in federal firearms and drug laws, drug identification, confidential source handling, and various surveillance and investigative techniques. I regularly refer to these laws and regulations during the course of my duties and have written and participated in the execution of several federal search and arrest warrants relating to violations of these laws. I have participated in many aspects of criminal investigations including conducting physical and electronic surveillance of individuals committing crimes of violence and narcotics trafficking, as well as prohibited persons in possession of firearms.

III. SUMMARY OF PROBABLE CAUSE

6. On May 15, 2025, Oxnard Police Department ("OPD") officers working uniformed gang enforcement, assigned to the Violent Crimes Unit ("VCU"), saw CONTRERAS, a known gang member who is on active parole with search conditions and global

positioning system ("GPS") location monitoring, near the intersection of Arcturus Avenue and Hueneme Road in Oxnard, California.

7. The OPD officers conducted a search of CONTRERAS pursuant to his search terms and, later, of a recreational vehicle ("motorhome") parked in Oxnard where he lives. During the search of the motorhome, officers found a hidden compartment inside of the vehicle which contained four firearms and ammunition. CONTRERAS is a convicted felon prohibited from owning firearms or ammunition.

IV. STATEMENT OF PROBABLE CAUSE

8. Based on my review of law enforcement reports and the officers' body camera footage, conversations with other law enforcement agents, and my own knowledge of the investigation, I am aware of the following:

A. Officers Conduct a Parole Search and Find Multiple Firearms and Ammunition in CONTRERAS's Motorhome

9. In the morning on May 15, 2025, OPD officers saw CONTRERAS standing near the intersection of Arcturus Avenue and Hueneme Road in Oxnard, California. Officers were familiar with CONTRERAS, who they knew to be a documented member of the Colonia Chiques gang. They also knew that CONTRERAS was currently on active parole with suspicion-less search conditions and was assigned a GPS monitor.

10. Officers approached CONTRERAS, detained him, and conducted a compliance search. CONTRERAS had a set of keys on his belt loop. Officers called CONTRERAS's parole officer, who

confirmed that CONTRERAS currently resides in a motorhome parked near McWane Boulevard and Edison Drive in Oxnard. OPD officers were also informed that GPS monitoring of CONTRERAS confirmed this location. Prior compliance checks by OPD of CONTRERAS also occurred in a motorhome in that area. CONTRERAS identified which key on his key ring opened his motorhome.

11. OPD officers then went to CONTRERAS's motorhome parked at the corner of McWane Boulevard and Edison Drive, Oxnard California bearing California license plate 8NLS465, knocked on the door and, after there was no answer, used the key CONTRERAS identified to unlock and open the door to conduct a parole compliance check.

12. When officers entered the motorhome, a woman was inside. She was instructed to exit. During the search, OPD officers located a hidden compartment behind a panel on the wall of the motorhome, which had access for only one hand. An officer removed the surface wall to allow for easier access and sight into the compartment. Inside, OPD officers found:

- a. a black plastic bag containing live 9mm ammunition;
- b. a blue bandana containing four (4) .38 caliber ammunition rounds and sixteen (16) 9mm ammunition rounds;
- c. a small black box containing three (3) 9mm ammunition rounds;
- d. a black Sig Sauer P320 Pro, bearing serial number 58J488521 with a round in the chamber and a fully loaded 21 round magazine;

e. a black Smith & Wesson, .357 caliber revolver bearing serial number 37542;

f. a silver Smith & Wesson, .38 caliber revolver bearing serial number BNY3677; and

g. a black NEF, .22 caliber revolver bearing serial number NB010282.

13. A firearms records check was conducted, and the following two firearms were reported stolen: the Sig Sauer P320 Pro was reported stolen out of Houston, Texas and confirmed by Houston Police Department, along with the silver Smith and Wesson .38 caliber revolver out of Ventura, California. None of the firearms recovered were registered to CONTRERAS.

B. CONTRERAS is a Convicted Felon and Prohibited from Owning Firearms or Ammunition

14. On May 19, 2025, I reviewed criminal history documents for CONTRERAS and learned that CONTRERAS has previously been convicted of the following felony crimes punishable by a term of imprisonment exceeding one year:

a. On or about March 8, 2004, a violation of Force/Assault with a Deadly Weapon Not a Firearm; Great Bodily Injury likely, in the Superior Court for the State of California, County of Ventura, Case Number 2004008990.

b. On or about September 3, 2005, a violation of Possession of Narcotic Controlled Substance, in the Superior Court for the State of California, County of Ventura, Case Number 2005030624.

c. On or about January 18, 2012, violations of Carry Concealed Weapon in a Vehicle and Felon in Possession of Firearm, in the Superior Court for the State of California, County of Ventura, Case Number 2012002024.

d. On or about June 23, 2018, a violation of Brandishing/Exhibiting a Loaded Firearm, in the Superior Court for the State of California, County of Ventura, Case Number 2018021702.

C. Interstate Nexus

15. On May 29, 2025, I spoke with ATF SA Christopher Stantzos, an Interstate Nexus Expert, about the four firearms and ammunition for purpose of determining interstate nexus. SA Stantzos confirmed that the firearms and ammunition were manufactured outside of the State of California, indicating that each has traveled in and affected interstate commerce.

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V. CONCLUSION

16. For all of the reasons described above, there is probable cause to believe that Sergio Ivan CONTRERAS has committed a violation of 18 U.S.C. § 922(g)(1): Felon in Possession of a Firearm

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 30th day of May,
2025.



HON. JEAN P. ROSENBLUTH
UNITED STATES MAGISTRATE JUDGE